

REMARKS

Claims 2-4, 6, 9-11, and 13 now remain pending in this application for which applicants seek reconsideration.

Amendment

Claims 5, 7, 12, and 14 have been canceled, and independent claims 2 and 9 have been amended to incorporate the subject matter of claims 5 and 12, respectively. Independent claims 2 and 9 further have been amended to clarify that, while the image formation is being carried out in the second mode, all the scanners not being used for the image formation in the second mode are driven independently of the at least one of the plurality of scanners being used for the image formation in the second mode. No new matter has been introduced.

Art Rejection

Claims 2, 3, 5, and 9 were rejected under 35 U.S.C. § 102(b) as anticipated by Arai (USPGP 2002/0080220). As the examiner did not explicitly mention claims 10 and 12, it is not clear whether the examiner meant to group these claims with the rejection of independent claim 9. Applicants have assumed this to be the case. Applicants thus seek clarification from the examiner. Claims 4 and 11 were rejected under 35 U.S.C. § 103(a) as unpatentable over Arai in view of Gomi (USP 6,314,251). Lastly, claims 6, 7, 13, and 14 were rejected under § 103(a) as unpatentable over Arai in view of Oda (USP 6,094,208).

In rejecting the claims, the examiner interpreted independent claims 2 and 9 as merely calling for driving all the plurality of scanners during the first mode. In this respect, independent claims 2 and 9 have been amended to clarify that all the scanners not being used for the image formation in the second mode are driven independently of the scanner(s) being used for the image formation in the second mode while the image formation is being carried out in the second mode.

As previously explained, in Arai, each image forming units 4Y, 4M, 4C, 4K has an associated polygon mirror 434Y, 434M, 434C, and 434K for scanning. Referring to FIG. 4(b), in the monochrome printing mode, Arai initiates the polygon mirrors in the order of 434K, 434Y, 434M, and 434C. That is, the polygon mirror 434K is started first at t1. After a prescribed time  $\Delta T$ , the polygon mirror 434Y is started, and after the prescribed time  $\Delta T$ , the polygon mirror 434M is started, and further after the prescribed time  $\Delta T$ , the polygon mirror 434C is started. See paragraphs 51-54. Arai indeed discloses driving all the polygon mirrors 434Y, 434M, 434C used for the color printing mode but not being used for the monochrome printing mode over a

predetermined period while in the monochrome printing mode to achieve a ready-to-write state for color printing. See paragraph 55.

Arai, however, drives the polygon mirrors sequentially one after another over a predetermined period rather than driving them independently of the polygon mirror 434K used for the monochrome printing mode. That is, the periods at which the polygon mirrors 434Y, 434M, and 434C are driven are tied to the polygon mirror 434K. Accordingly, these polygon mirrors are not driven independently of the polygon mirror 434K. Based on this distinction alone, applicants submit that the pending claims define over the applied references.

Applicants also argued that Arai would not have disclosed or taught switching to the full color printing mode from the monochrome printing mode after the monochrome printing mode is finished. In response, the examiner argues that Arai teaches placing the printer into the ready-to-write condition for forming a full color image while in the monochrome printing mode. Paragraph 55 of Arai merely discloses preparing the printer for the ready-to-write condition, and does not disclose anywhere that it switches the color printing mode after the monochrome printing mode is completed. Indeed, Fig. 6 of Arai is telling. Here, Arai explicitly discloses after step F23, stopping the color polygons and the monochrome polygon. See paragraph 67. Accordingly, Arai further would not have disclosed or taught this aspect of the invention.

Neither Gomi nor Oda would have alleviated Arai's shortcomings noted above, even if these references were deemed properly combinable with Arai for argument's sake. Accordingly, applicants submit that the pending claims patentably distinguish over the applied references.

#### Conclusion

Applicants submit that this application is in condition for allowance. Should the examiner have any issues concerning this reply or any other outstanding issues remaining in this application, applicants urge the examiner to contact the undersigned to expedite prosecution.

Respectfully submitted,

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DATE

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